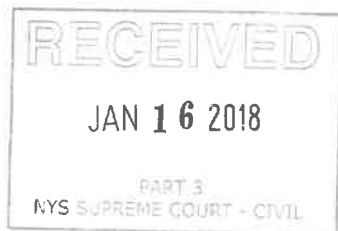


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January 16, 2018

Hon. Eileen Bransten
60 Centre Street, Room 521
New York, NY 10007

Re: *Eros International Plc v. Mangrove Partners, et al.*
Index No. 653096/2017

Dear Judge Bransten:

I am counsel to Eros International Plc in the above-referenced matter.

On November 30, 2017, the Moving Defendants¹ filed three separate orders to show cause, which seek the dismissal of Plaintiff's complaint pursuant to CPLR 3211(a)(1) and (7). Given that each of these briefs contain factual overlap and raise similar legal issues, Eros requests leave to file an omnibus opposition that does not exceed 60 pages, which is less than the 80 pages of briefing that Eros would be entitled to if it responded to each brief separately. Counsel for the Moving Defendants have notified me that they consent to this request.

I am also writing to request a brief extension of the due date for Eros' opposition brief from Thursday, January 18, 2018 to Tuesday, January 23, 2018, and to modify the due date for Defendants' reply briefs from Thursday, February 1, 2018 to Wednesday, February 7, 2018. My wife recently gave birth on January 6, 2018 and, due to unforeseen complications, my time out of the office was longer than I originally anticipated. Counsel for the Moving Defendants have notified me that they consent to this proposed modification.

This is Eros' first request for an extension in this matter. Eros does not anticipate that this proposed modification would disrupt the Court's calendar, as the Moving Defendants' motions would be fully briefed a week before the parties' February 14, 2018 hearing.

¹ "Moving Defendants" include all named Defendants except Manuel P. Asensio, Asensio & Company, Inc., Mill Rock Advisors, Inc., and all remaining John Does.

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We appreciate the Court's consideration of this request.

Respectfully submitted,



Stephen W. Tountas

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*Plaintiff's request to file an omnibus motion is denied.
Plaintiff's request for an extension of the briefing schedule is granted.
Opposition is now due by January 23, 2018.
Reply is now due by February 7, 2018.
Oral argument remains February 14, 2018.*


HON. EILEEN BRANSTEN 1/17/2018

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